

**MEMO ENDORSED**

**Office of the New York State  
Attorney General**

**Letitia James  
Attorney General**

April 11, 2025

**via ECF**

Hon. Victoria Reznik  
United States Magistrate Judge  
Southern District of New York  
300 Quarropas Street, Chambers 420  
White Plains, New York 10601-4150

Defendants' request is provisionally **GRANTED**, and the exhibits may be filed under seal pending the Court's resolution of the substantive motion at ECF No. 206. The Clerk of Court is directed to close the gavel associated with ECF No. 208.

Re: *Kravitz v. Annucci*, 16 Civ. 8999 (KMK)

Dear Judge Reznik:

SO ORDERED.

  
Hon. Victoria Reznik, U.S.M.J.

Dated: 4/15/2025

I write on behalf of Defendants Dennis McMahon and Joseph A. Wassweiler ("Defendants"). I write pursuant to Section 5(B) of Your Honor's Individual Rules, the Southern District of New York's Sealed Records Filing Instructions, and Paragraph 21 of the Confidentiality Stipulation and Protective Order ("Protective Order") entered by this Court on February 13, 2025 (ECF No. 182), to respectfully request leave to file under seal the exhibits attached to the accompanying Declaration of Nathaniel Gilles dated April 8, 2025 ("Declaration"). This Declaration is offered both in support of the present application and in support of Defendants' Response to Plaintiff's Pre-Motion Conference Letter (ECF No. 206). The basis for this request is that the documents at issue contain information that contain highly sensitive and confidential information or other matters that, if disclosed, could jeopardize correctional and institutional safety as well as the safety of the individuals therein. This information is based on documents that were designated either "Confidential" and/or "Attorney's Eyes-Only" pursuant to the Protective Order.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ **Maurice K. Nwikipo-Oppong**

**MAURICE NWIKPO-OPPONG, ESQ.**

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CC: All Counsel of Record via ECF